



July 2016

MILITARY PERSONNEL

DOD Needs More Complete Data on Active-Duty Servicemembers' Use of Food Assistance Programs

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Why GAO Did This Study

According to the Defense Commissary Agency, servicemembers on active duty spent over \$21 million in SNAP benefits at commissaries from September 2014 through August 2015. This suggests that people serving our country may be having difficulty making ends meet. House Report 114-102 includes a provision that GAO review food assistance programs available to servicemembers. This report assesses, among other things, the extent to which (1) active-duty servicemembers and their families have access to food assistance programs and any variations in eligibility for these programs, and (2) DOD has identified the servicemembers' use of these programs. GAO reviewed information on government and charitable food assistance programs and policies. GAO also interviewed DOD and service officials at four installations that were selected based on size, cost of living, and presence of food assistance programs.

What GAO Recommends

GAO recommends that DOD (1) revise surveys of servicemembers to collect and analyze more complete data and, if warranted, implement actions such as assigning department-level responsibilities for monitoring food assistance; and (2) coordinate with USDA to access its usage information. DOD concurred with the first recommendation and partially concurred with the second, stating that it has tried to coordinate with USDA. GAO continues to believe the recommendation is valid, as discussed in this report.

View [GAO-16-561](#). For more information, contact Brenda S. Farrell at (202) 512-3604 or farrellb@gao.gov.

What GAO Found

Active-duty servicemembers and their families have access to food assistance through various government and charitable programs, but use of these programs varies, in part, on their ability to meet specific eligibility criteria. In an April 2010 report, GAO identified 18 government programs that provide food assistance to low-income households. Servicemembers may apply for and, if they qualify, receive benefits from any of these programs. However, servicemembers' eligibility for these programs can vary by program and location. For example, GAO found that it might be easier for servicemembers to qualify for Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) than Supplemental Nutrition Assistance Program (SNAP) because WIC allows state agencies to exclude portions of a servicemember's pay when determining eligibility and SNAP does not. Also, charitable organizations, such as food pantries, are available to servicemembers in need of food assistance.

The Department of Defense (DOD) has some data on servicemembers' use of food assistance programs it administers, but it does not know the extent that servicemembers use such programs because (1) it is not fully collecting or analyzing such information within the department, and (2) it has not coordinated with organizations such as U.S. Department of Agriculture (USDA) to access their data on servicemembers' use of their programs. *Standards for Internal Control in the Federal Government* state that management should use quality information to achieve its objectives. DOD has data on the number of servicemembers' children receiving free and reduced-price school meals at DOD Education Activity (DODEA) schools in the United States. For example, DODEA data for September 2015 showed that 24 percent of children in DODEA schools in the continental U.S. were eligible for free meals and 21 percent were eligible for reduced-price meals. A DOD survey also provides some information on servicemembers' use of food assistance programs such as SNAP. However, this survey is of limited usefulness in part because it does not inquire about other food assistance programs used by servicemembers such as National School Lunch Program; also no office within DOD is monitoring food assistance needs such as through survey data. Without more complete survey data, DOD will not understand the prevalence of need among servicemembers to effectively target its support and determine if it should assign department-level responsibility for monitoring food assistance needs.

Standards for Internal Control in the Federal Government also state that management should communicate with external parties to obtain needed information. USDA has access to data on servicemembers' use of food assistance programs, but none of the DOD officials with whom GAO spoke were aware of efforts by the department to coordinate with USDA to access these data. For example, USDA administers SNAP benefits that, according to a 2013 U.S. Census Bureau survey, were used by about 23,000 active-duty servicemembers in the previous 12 months. The National Defense Authorization Act for Fiscal Year 2016 included a provision to address the sharing of SNAP data between USDA and DOD; however, DOD does not have a coordination effort underway to access such data. Without such coordination, DOD will miss the opportunity to collect data on the needs of its servicemembers.

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Abbreviations

BAH	Basic Allowance for Housing
BAS	Basic Allowance for Subsistence
DOD	Department of Defense
DODEA	DOD Education Activity
FSSA	Family Subsistence Supplemental Allowance
NDAA	National Defense Authorization Act
NSLP	National School Lunch Program
SBP	School Breakfast Program
SFSP	Summer Food Service Program
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USD (P&R)	Under Secretary of Defense for Personnel and Readiness
USDA	United States Department of Agriculture
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

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July 15, 2016

Congressional Committees

According to the Defense Commissary Agency, servicemembers on active duty spent over \$21 million in food stamp benefits at military commissaries from September 2014 through August 2015. This suggests that some people serving our country may be having difficulty making ends meet. Military families facing financial hardship have federal, state and private-sector options for food assistance. One option provided by the Department of Defense (DOD) to active-duty servicemembers is the Family Subsistence Supplemental Allowance (FSSA). In 2000, Congress created FSSA as an alternative to the United States Department of Agriculture's (USDA) Supplemental Nutrition Assistance Program (SNAP)—formerly called the Food Stamp Program. However, in 2015, the Military Compensation and Retirement Modernization Commission reported that few active-duty servicemembers took advantage of FSSA and recommended that Congress end the FSSA program for servicemembers located in the United States and its territories, and refer servicemembers to apply for benefits under the USDA's SNAP program.¹ The National Defense Authorization Act (NDAA) for Fiscal Year 2016 implemented the commission's recommendation with the effect that after September 30, 2016, FSSA will be available only to active-duty servicemembers serving outside the United States and its territories. However, a 2015 House Armed Services committee report stated a concern that active-duty servicemembers and their families may have a continuing need for nutrition assistance.

House Report 114-102, which accompanied a bill for the NDAA for fiscal year 2016, includes a provision that we review the food assistance programs available to active-duty servicemembers and their families. Subsequently, the Senate Agriculture, Nutrition, and Forestry committee

¹The Military Compensation and Retirement Modernization Commission was established by the National Defense Authorization Act (NDAA) for Fiscal Year 2013, Pub. L. No. 112-239, §§ 671-80 (2013), to provide the President of the United States and the Congress specific recommendations to modernize the military compensation and retirement systems.

became co-requesters of our work in response to this House report provision. This report assesses (1) the extent to which active-duty servicemembers and their families have access to government and charitable food assistance programs and any variations in eligibility requirements for these programs, (2) the extent to which DOD has identified active-duty servicemembers' use of food assistance programs, and (3) any challenges that active-duty servicemembers encounter when seeking food assistance.²

For our first objective, we reviewed our prior related reports and a Congressional Research Service report on domestic food assistance programs, and we interviewed officials from DOD and USDA to identify food assistance programs available to active-duty servicemembers and their families. We interviewed officials who administer these programs at the federal, state, and local levels to obtain additional background information and to confirm the availability and our understanding of the food assistance programs we identified. We also met with representatives of various charitable organizations that provide food assistance to active-duty servicemembers and their families. To determine if there were any variations in eligibility requirements in government food assistance programs, we reviewed the laws that established selected food assistance programs and analyzed eligibility criteria for these programs and used those eligibility criteria to develop scenarios to illustrate situations in which a servicemember would or would not qualify for these food assistance programs.

For our second objective, we interviewed officials from multiple offices within the Under Secretary of Defense for Personnel and Readiness (USD (P&R)) to determine which office(s) had department-level responsibilities related to active-duty servicemembers' use of food assistance programs and to obtain any relevant data on servicemembers' use of these programs. We reviewed DOD documents on the organization and the assigned responsibilities of USD (P&R). We

²The House Report 114-102 originally requested that we examine servicemembers' access to and use of nutrition assistance programs. However, early in our review, we determined that agency officials interpreted "nutrition assistance" as relating to a servicemember's diet as opposed to our intended focus on their access to food. As discussed with congressional staff, we replaced "nutrition assistance" with "food assistance" to clarify our intent and to mitigate further confusion about the focus of our review.

obtained and reviewed DOD's Status of Forces Survey of Active Duty Members for calendar years 2010, 2012, and 2013, the U.S. Census Bureau's 2013 American Community Survey, FSSA data from the Defense Joint Military Pay System, and data on the number of students in DOD Education Activity (DODEA) schools who were eligible to receive free and/or reduced-price meals. We found this information to be sufficiently reliable for the purpose of reporting on DOD's awareness of military participants receiving these benefits. Also, we compared the data collection and communications processes for DOD with *Standards for Internal Control in the Federal Government*, which state that management should obtain quality information to achieve its objectives and that it should communicate with external parties regarding the information that is needed to achieve its objectives.³ To obtain information on other food assistance programs available to servicemembers and their families, we visited four selected military installations in the United States and interviewed officials who administer these programs, officials who assist servicemembers in need, and visited food pantries, if any, on the installation. We selected sites to represent each of the military services and to include locations with a large population of servicemembers and dependents, a range of cost-of-living areas—using the Basic Allowance for Housing (BAH)⁴ rates—and a food pantry and/or a Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)⁵ program office on the military installation. Based on these criteria, we visited Fort Hood, Texas; Naval Base San Diego, California; Marine Corps Base Camp Pendleton, California; and Altus Air Force Base, Oklahoma. During our site visits, we met with military officials who assist

³See GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999). These standards were in effect prior to fiscal year 2016 and cover the time period of government agencies' data. The standards were subsequently updated. The updated standards went into effect on October 1, 2015. See GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁴BAH is an allowance paid to cover housing expenses of servicemembers not residing in military housing. Approximately two-thirds of servicemembers receive BAH. BAH rates vary by geographic region to accommodate the wide variations in housing costs across the country. The amount paid is based on geographic duty location, pay grade, and family status.

⁵WIC provides supplemental, nutrient-rich foods; nutrition education, including breast-feeding promotion and support, to low-income infants, children and women who are pregnant, postpartum, and breastfeeding.

servicemembers and their families in financial difficulty— which may include a need for food assistance—as well as state and local officials who oversee non-military food assistance programs that servicemembers may use. We also met with representatives from military and non-military charitable organizations to learn what food assistance they provide to active-duty servicemembers and their families.

For our third objective, we conducted site visits to four selected military installations and interviewed military service officials who work with servicemembers in need to gain their perspectives on any challenges that may be faced by servicemembers attempting to obtain food assistance. Specifically, we interviewed military Chaplains, First Sergeants and Command Master Chiefs, financial specialists, and officials from charitable military organizations, including Army Emergency Relief, the Navy-Marine Corps Relief Society, and the Air Force Aid Society.⁶ We also interviewed private and local government officials who assist civilians and some servicemembers with food assistance, such as SNAP, WIC, summer meals programs, and food pantries. Further, we interviewed representatives from advocacy groups who support active-duty families or try to reduce hunger in America. We provide further details on our scope and methodology in Appendix I.

We conducted this performance audit from July 2015 to July 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

⁶We interviewed officials from these charitable military organizations because they are the ones most likely to assist servicemembers when they experience financial difficulty, such as the need for food assistance.

Under Secretary for Personnel and Readiness Is Responsible for Areas That Affect Personnel Health and Welfare

The Under Secretary for Personnel and Readiness (USD (P&R)) is the principal staff assistant and advisor to the Secretary of Defense for Total Force Management as it relates to readiness, health affairs, training, personnel requirements, and quality-of-life matters.⁷ USD (P&R) is the Secretary's senior policy advisor on recruitment, career development, and pay and benefits for military personnel and DOD civilians. The USD (P&R) oversees the Defense Health Program, Defense Commissary Agency, the Defense Education Activity, Defense Manpower Data Center, Military Community and Family Policy, and others. USD (P&R) responsibilities include, but are not limited to, developing policies, plans, and programs for compensation of military personnel and quality of life for military personnel and their families.

Defense Commissaries Sell Servicemembers Food at Reduced Cost

Although included in the military compensation system as a non-cash benefit, DOD commissaries can be considered a food assistance program in that the commissaries provide servicemembers an opportunity to purchase food at reduced cost. Active-duty servicemembers receive a compensation package that includes cash compensation, non-cash compensation, and deferred compensation. Non-cash compensation includes various types of benefits such as health care, child-care centers, educational benefits, and access to subsidized commissaries (i.e., grocery stores). DOD operates a worldwide chain of commissaries that sell food and related household items to active-duty, reserve and guard members of the military services, retirees of these military services, their families, and other authorized patrons. According to the Defense Commissary Agency's *Annual Financial Report Fiscal Year 2015*, DOD's 240 commissaries sold \$5.5 billion of items to approximately 5.3 million households in fiscal year 2015. Commissaries sell food and related household items to authorized patrons at cost plus a 5-percent surcharge, which DOD estimates saves patrons an average of more than 30 percent on their purchases compared to commercial prices. The Defense Commissary Agency wrote in its report that it received \$1.3 billion in appropriation transfers during fiscal year 2015.

⁷The total force is the organizations, units, and individuals that comprise the DOD resources for implementing the National Security Strategy. It includes DOD active and reserve component military personnel, military retired members, DOD civilian personnel (including foreign-national direct and indirect hires, as well as nonappropriated fund employees), contractors, and host-nation support personnel.

Department of Agriculture Administers Most of the Federal Domestic Food Assistance Programs

The USDA's Food and Nutrition Service has responsibility for administering most of the federal domestic food and nutrition programs, including the five largest programs. As the federal government's primary domestic food assistance agency, USDA aims to help households achieve food security—that is, to have consistent, dependable access to enough food for an active, healthy life—and monitors the extent and severity of food insecurity. The Department of Health and Human Services and the Department of Homeland Security also fund programs that provide food and nutrition assistance.

In May 2015, we testified before Congress that, in fiscal year 2014, the federal government spent more than \$100 billion on 18 domestic food assistance programs.⁸ Specifically, we identified that program spending ranged from approximately \$5 million on the Community Food Projects Competitive Grants Program to more than \$74 billion on SNAP. Our testimony also stated that in fiscal year 2014, the five largest food assistance programs—SNAP, National School Lunch Program (NSLP), WIC, School Breakfast Program (SBP), and the Child and Adult Care Food Program—accounted for 96 percent of total spending on the 18 programs. SNAP, the largest program, accounted for more than 70 percent of the overall spending total. SNAP, NSLP, SBP, and the Child and Adult Care Food Program are entitlement programs, meaning that federal law requires benefits to be provided to all applicants who meet eligibility requirements.

⁸GAO, *Domestic Food Assistance: Multiple Programs Benefit Millions of Americans, but Additional Action Is Needed to Address Potential Overlap and Inefficiencies*, [GAO-15-606T](#) (Washington, D.C.: May 20, 2015).

Active-Duty Servicemembers Have Access to Various Government and Charitable Food Assistance Programs, but Their Eligibility for Some Government Programs Can Vary

Active-duty servicemembers and their families have access to food assistance through various government and charitable programs, but their eligibility for some government food assistance programs can vary based on the programs' income criteria and servicemembers' location.

Active-Duty Servicemembers Have Access to Various Government and Charitable Food Assistance Programs

Active-duty servicemembers and their families have access to food assistance through a variety of government and charitable sources. For example, in a testimony before Congress on May 2015, we identified 18 selected federal government programs that focus primarily on providing food and nutrition assistance, such as SNAP and WIC, to low-income individuals and households.⁹ Active-duty servicemembers and their families may apply to any of these programs, and can receive benefits if they meet the eligibility requirements. Appendix II provides a general description of these 18 programs as well as the target population. Additionally, DOD provides active-duty servicemembers with FSSA. By design, the FSSA program increases a servicemember's income by an amount to preclude them from applying for benefits under the SNAP program. However, the NDAA for fiscal year 2016 restricted the availability of FSSA to only servicemembers stationed outside the United States and its territories starting October 1, 2016. Servicemembers stationed in the United States and its territories and in need of food

⁹[GAO-15-606T](#). The testimony documented in [GAO-15-606T](#) was largely based on a report we issued in April 2010 that examined domestic food assistance programs—GAO, *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*, [GAO-10-346](#) (Washington, D.C.: Apr. 15, 2010). In the report, we describe how the 18 programs were selected.

assistance previously provided by FSSA are expected to apply to the SNAP program.

In addition to the government food assistance programs, active-duty servicemembers and their families can seek assistance from a variety of charitable organizations. For example, each military service has a charitable organization such as the Army Emergency Relief that, depending on the type of assistance needed, is able to provide servicemembers with grants or interest-free loans that can be used to purchase food and to help meet any other immediate needs they may have in an emergency situation. During our visits to four selected military installations, we also found that additional assistance may be available to active-duty servicemembers and their families through locally-developed initiatives, such as food pantries, that are typically organized by volunteers to address food assistance needs at a particular military installation. Many of the food pantries we examined were local operations intended to meet emergency needs; however, at one of the military installations we visited there were four food pantries operating on the installation that provided food routinely once a month. Table 1 provides further details about some of the different types of food assistance available to active-duty servicemembers and their families.

Table 1: Examples of Agencies and Organizations That Provide Food Assistance to Active-Duty Servicemembers and Their Families

Category of food assistance	Organization/program	Description
Government programs	DOD's Family Subsistence Supplemental Allowance (FSSA)	FSSA is a monetary supplement that increases a servicemember's household income to 130 percent of federal poverty guidelines.
	USDA's Supplemental Nutrition Assistance Program (SNAP)	SNAP provides nutrition assistance benefits via Electronic Benefit Transfer (EBT) cards to low-income individuals in order to purchase food at authorized stores.
	USDA's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	WIC provides supplemental, nutrient-rich foods; nutrition education, including breast-feeding promotion and support, to low-income infants, children and women who are pregnant, postpartum, and breastfeeding.
	USDA's National School Lunch Program (NSLP) and School Breakfast Program (SBP)	NSLP and SBP programs provide low-income students with nutritionally balanced low-cost or free lunches and breakfasts at school.
	USDA's Summer Food Service Program (SFSP)	SFSP provides federal cash assistance and some commodity foods to local public and private nonprofit service institutions running summer youth programs, camps, or other recreation sites that serve low-income children during their summer break or during lengthy school-year breaks. Any child, 18 or younger, or certain individuals with disabilities over the age of 18, can receive a meal at a SFSP site.
Charitable organizations	Military	
	Navy-Marine Corps Relief Society (NMCRS)	NMCRS provides financial, educational, and other need-based assistance to active-duty and retired sailors and marines, their eligible family members, and survivors.
	Air Force Aid Society (AFAS)	AFAS provides emergency assistance to airmen and their eligible family members to meet immediate needs in an emergency situation.
	Army Emergency Relief (AER)	AER provides emergency financial assistance to soldiers (active and retired) and their families in time of distress.
	Community-based	
	Food pantries/banks	Local, independent, and volunteer organizations that provide food to people in need.

Source: GAO review of agency documents. | GAO-16-561

Servicemembers' Eligibility for Government Food Assistance Programs Can Vary Based on the Program's Criteria and the Servicemember's Location

An applicant's income must be below a given level in order to qualify for benefits from the government food assistance programs. To develop an understanding of how active-duty servicemembers could meet the financial criteria, we compared the base income for servicemembers in a specific paygrade with the income eligibility requirements for five government food assistance programs that are commonly used by active-duty servicemembers and their families. Specifically, these five programs include DOD's FSSA—the only food assistance program offered through DOD—and four USDA programs, including SNAP, WIC, NSLP, and SBP.¹⁰ These programs' statutory authorities define the financial criteria as a maximum income limit by household or family size.¹¹ Our comparison enabled us to develop an understanding of the size of household or family a servicemember in a specific paygrade would need in order to qualify for a program.¹² Although other factors beyond household or family size and base income affect servicemembers' eligibility for these food assistance programs, our analysis is generally limited to these factors in order to isolate the effect of income on eligibility.¹³ Further, we recognize that to receive benefits the servicemember would also have to meet the program's non-financial eligibility requirements, which are detailed in appendix III. Given that, we compared the basic pay and allowances of a servicemember in the E-4 paygrade with maximum income eligibility criteria for the five government food assistance programs commonly used by active-duty servicemembers and their families and determined the minimum

¹⁰The four programs USDA provides are ones that it promotes to military families and that DOD officials confirmed active-duty servicemembers used.





















¹¹In determining eligibility for SNAP, FSSA, WIC, NSLP, and SBP, household or family is not limited to just the servicemember and his or her dependents. For SNAP and FSSA, the household may include any group of individuals who live together and customarily purchase food and prepare meals together for home consumption. For WIC, NSLP, and SBP, a household or family may include a group of related or nonrelated individuals who are not residents of an institution, boarding house, or homeless shelter, but who are living together as one economic unit.


¹²According to DOD's *2014 Demographics: Profile of the Military Community*, active-duty servicemembers with dependents have an average of 2.4 dependents.

¹³When conducting our analysis, we made certain assumptions about the characteristics of servicemembers' households or families so as to remove the influence of these factors on a servicemember's eligibility and allow us to see the impact of income on the servicemember's eligibility. For example, for SNAP we assumed that servicemembers did not have any dependent care or child-support deductions.

household or family size the servicemember needed in order to qualify for each program. We selected the paygrade of E-4 in part because it includes junior enlisted personnel who are compensated at the lower end of the pay scale for active-duty servicemembers. Further, DOD's data on FSSA recipients showed that servicemembers in the paygrade of E-4 were the most frequent recipients of this allowance, thus suggesting that there may be food assistance needs more commonly experienced by personnel at this paygrade. The results of our analysis are presented in Figure 1 and show that a servicemember's income eligibility will likely vary based on where he or she lives and the program through which one applies for food assistance.

Figure 1: Minimum Household Size Required for a Servicemember in the Paygrade of E-4 to Qualify for Commonly Used Government Food Assistance Programs

Location ^a		Naval Base San Diego California	Camp Pendleton California	Fort Hood Texas	Altus Air Force Base Oklahoma
Estimated monthly income for servicemember in the paygrade of E-4 ^b		\$4,784	\$4,475	\$3,758	\$3,395
Family Subsistence Supplemental Allowance (FSSA)		 9	 9	 7	 6
Supplemental Nutrition Assistance Program (SNAP) ^c		 7	 6	 6	 6
National School Lunch Program (NSLP) and School Breakfast Program (SBP) ^d	Residing in local community ^e	 6	 6	 5	 4
	Residing in privatized military housing	 3	 3	 3	 3
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)		 3	 3	 3	 2

 One person

Source: GAO analysis of state and federal program guidance. | GAO-16-561

^aThese locations were selected to represent: each of the military services and to include locations with a large population of servicemembers and dependents, a range of cost-of-living areas (using the Basic Allowance for Housing (BAH) rates), and the presence of a food pantry and/or a WIC program office on the installation.

^bIn calculating the E-4 salary, we included only three types of pay: Basic Pay, Basic Allowance for Subsistence (BAS), and BAH with dependent rate. We included these elements of military pay because active-duty servicemembers who are entitled to basic pay are also entitled to BAS and BAH. We did not include other military pay and allowances because active-duty servicemembers are not all

eligible for the other pay and allowances. Our analysis is based on the assumption that the only source of income for the household is the servicemembers' military pay.

^cIn calculating the minimum household size to qualify for SNAP benefits, we assumed that the household does not include any elderly or disabled persons, there were no dependent care, medical expenses, or child-support deductions, the monthly rent or mortgage payment equaled the servicemember's BAH, and the standard utility allowance was appropriate to use in the calculations.

^dThe NSLP and SBP provide free or reduced-priced school meals. The minimum household size presented here is only for reduced-price meals.

^eEligibility for free and reduced-price school meals under the NSLP and SBP is addressed separately in this table for servicemembers who live in privatized military housing and those residing in the local community because of how the servicemember's BAH is treated. For servicemembers residing in privatized military housing, BAH is not included in income when determining eligibility for free and reduced-price school meals. However, for servicemembers receiving BAH and who do not reside in privatized government housing, BAH is included in income.

We found that each of the government food assistance programs included in our review requires that an applicant's household or family income falls below a specified amount to qualify for benefits and that this income limit varies by program and sometimes by state. Further, including BAH benefits in a determination of an applicant's income eligibility also plays a role in the food assistance programs used by active-duty servicemembers and their families. Specifically, we found that it might be easier for servicemembers to qualify for WIC than SNAP or FSSA because WIC allows state agencies to choose to exclude BAH from income. For example, based on our analysis a servicemember at Naval Base San Diego, California, would need a minimum household size of 3 to qualify for WIC benefits, but would require a minimum household size of 7 to qualify for SNAP benefits and a minimum household size of 9 to qualify for FSSA. We also found that servicemembers may be more likely to qualify for free or reduced-price meals from NSLP and SBP if they reside in privatized housing than if they live in the local community because the eligibility criteria for those programs do not count BAH as income for servicemembers living in privatized military housing.¹⁴ For example, based on our analysis a servicemember residing in privatized military housing on Camp Pendleton in California would require a minimum household size of 3 to qualify for reduced-price school meals compared to a servicemember residing in the local community who would need a minimum household size of 6 to qualify.

¹⁴42 U.S.C. § 1758(b)(13); *id.* at § 1773(e)(1)(A) (citing to the eligibility standards in 42 U.S.C. § 1758).

Based on our analysis, we found that it might be easier for servicemembers to qualify for SNAP than FSSA because SNAP's statutory authority¹⁵ gives the states, in certain instances, the option to increase the gross-income limit for SNAP to as much as 200 percent of the federal poverty guidelines¹⁶ but fixes the income limit for FSSA at 130 percent of the federal poverty guidelines regardless of the state the servicemember lives in. For example, our analysis suggests that a servicemember at Camp Pendleton, California, would need a minimum household size of 6 to qualify for SNAP benefits but would require a minimum household size of 9 to qualify for FSSA, and a servicemember at Fort Hood, Texas, would need a minimum household size of 6 to qualify for SNAP benefits but would require a minimum household size of 7 to qualify for FSSA benefits. In this example, a smaller household size is required to qualify for SNAP than for FSSA primarily because California and Texas raised the gross-income test for SNAP to 200 percent and 165 percent of federal poverty guidelines, respectively. Appendix III details both the income and non-income eligibility criteria for the government food assistance programs commonly used by active-duty servicemembers and their families.

DOD Does Not Know the Extent to Which Servicemembers Use Food Assistance Programs

DOD has some data on servicemembers' use of food assistance programs that it administers, but DOD does not know the extent to which servicemembers use food assistance programs because (1) its officials are not fully collecting or analyzing such information within the department, and (2) DOD officials we spoke with were not aware of efforts to coordinate with USDA to access data on servicemembers' use of the respective programs. We contacted multiple offices within DOD to obtain data on the use of food assistance programs and found that none of the offices had efforts to monitor servicemembers' food assistance

¹⁵7 U.S.C. § 2014(a).

¹⁶Under expanded eligibility rules, called "broad-based categorical eligibility," states can allow households receiving noncash services funded by Temporary Assistance for Needy Families (such as a toll-free number or brochure) to be automatically eligible for SNAP. States that adopt a broad-based categorical eligibility policy may increase limits on household gross income up to 200 percent of federal poverty guidelines. However, categorically eligible households have their SNAP benefits determined under the same rules as other households, and while the household may be categorically eligible, its income may be too high to actually receive a SNAP benefit.

needs. Further, DOD has not assigned responsibility for monitoring servicemembers' use of food assistance programs.

DOD Does Not Collect and Analyze Relevant Data on Servicemembers' Use of Food Assistance Programs

We found that some data exist within and outside of DOD on the use of the food assistance programs by active-duty servicemembers and their families. However, DOD does not know the extent to which these programs are used. *Standards for Internal Control in the Federal Government* states that management should use quality information to achieve the entity's objectives, and defines quality information as complete, accurate and current.¹⁷

Some Data Are Available within DOD on Servicemembers' Use of Food Assistance

As the administrator of FSSA, DOD has data on servicemembers who receive the FSSA benefit. Specifically, based on Defense Joint Military Pay System records, 188 active-duty servicemembers received FSSA benefits in calendar year 2015, 224 received benefits in calendar year 2014, and 285 received benefits in calendar year 2013. However, these data are of limited usefulness because DOD does not collect and analyze relevant data that are available from other sources within the department and that would facilitate a more comprehensive understanding of servicemembers' use of food assistance programs. Further, FSSA data alone will provide fewer insights into servicemembers' use of food assistance programs in the future because, as previously noted, the benefit will no longer be available to servicemembers who are stationed within the continental U.S. after September 30, 2016.

Through the DOD Education Activity (DODEA), which operates 52 schools on military installations within the continental United States, DOD has access to data on the number of children who attend these schools and are eligible to receive free and reduced-price lunches and breakfast.¹⁸ For example, we obtained data from DODEA officials for the 2014-2015 school year that showed, on average, of the 19,001 children enrolled in DODEA schools in the continental United States, 26 percent

¹⁷GAO-14-704G. The standards were updated and went into effect on October 1, 2015. The current standards describe the need for quality information similar to the prior standards described in [GAO/AIMD-00-21.3.1](#) which were in effect prior to fiscal year 2016 and cover the time period of government agencies' data.

¹⁸DODEA schools within the United States serve dependent children of DOD military members on active duty and civilian federal employees assigned permanent living quarters on a military installation, as well as other eligible dependents if space is available.

(5,010) were eligible for free meals and 25 percent (4,675) were eligible for reduced-price meals. In addition, DODEA officials provided data for September 2015—the start of the 2015-2016 school year—that showed that 24 percent of the 18,228 (4,427) children enrolled in DODEA schools in the continental United States were eligible for free meals and 21 percent (3,909) were eligible for reduced-price meals. These data do not fully capture the use of food assistance by servicemembers and their families, but they may be an indicator of a need that exists for a specific population within the military services. However, a DODEA official stated that prior to our request she was not aware of any efforts by DOD to collect and analyze such data to better understand the extent to which servicemembers use food assistance.

DOD also periodically conducts Status of Forces surveys that seek to understand attitudes and views on a wide range of personnel issues and the results of which are used to help DOD decision makers evaluate existing programs and policies, establish baselines before implementing new programs and policies, and monitor the progress of programs and policies and their effects on the total force.¹⁹ However, DOD has not utilized this survey as a tool to collect and analyze data on the use of food assistance programs by active-duty servicemembers and their families. DOD Instruction 1342.22 directs DOD's family readiness services, which include a variety of support programs for servicemembers and their families that range from financial assistance to child care, be designed, funded, and managed using results obtained from a performance management strategy that includes assessment of needs.²⁰ DOD's Status of Forces surveys include a survey of active-duty servicemembers that, in recent years, has included questions about the use of food assistance programs. Based on the 2013 survey—the most recent results

¹⁹Status of Forces surveys are administered to a variety of DOD personnel, but we limit our reference to the active-duty survey because our report is focused on active-duty servicemembers. Other Status of Forces surveys include a survey of reserve component personnel, called the Status of Forces Survey Reserve Component Members; and a survey of civilian employees, called the Status of Forces Survey of DOD Civilian Employees. These surveys include outcome—"leading indicator"—measures for these individuals, such as overall satisfaction, retention intention, and perceived readiness, as well as demographic items needed to classify individuals into various subpopulations.

²⁰Department of Defense Instruction 1342.22, *Military Family Readiness* (July 3, 2012).

available—DOD estimated that 2 percent (about 20,000)²¹ of active-duty servicemembers or their spouses had received income or financial support from SNAP²² in the previous 12 months and 9 percent received income from either WIC and/or Temporary Assistance For Needy Families (TANF).²³ However, the WIC and TANF data are of limited usefulness in determining the extent to which servicemembers use food assistance, in part, because it combines data on WIC—a food assistance program—with TANF data—a non-food assistance program. The survey also does not specifically address other sources of food assistance that may be used by active-duty servicemembers and their families such as NSLP, SBP, SFSP, or food pantries. Further, in July 2010,²⁴ we reported that the low response rates to the Status of Forces Survey could potentially bias the survey results and recommended that the Defense Manpower Data Center develop and implement guidance to conduct a nonresponse analysis. DOD agreed with the recommendation, but it has not fully implemented our recommendation because, according to DOD officials, funding is not currently available to carry out the full intent of the recommendation. Without more complete data, DOD will not be able to identify the prevalence of need and the use of food assistance programs by active-duty servicemembers. Furthermore, DOD will be unable to effectively target its support so that it is producing maximum benefit for those in need.

²¹The survey estimate has a margin of error of plus or minus 2 percent, which means the actual number of servicemembers receiving SNAP could range from 0 to about 40,000.

²²In technical comments on this report, USDA officials stated that the question asked by DOD in its Status of Forces survey was incorrect in that SNAP is not a financial or cash benefit. Instead, the question should have asked servicemembers if they had received any SNAP benefits.

²³TANF is a program designed to help needy families achieve self-sufficiency and is not applicable to this review. However, we reference TANF data from DOD's 2013 Status of Forces Survey because it is combined with and cannot be broken out from data reported on WIC, which is addressed in this review.

²⁴GAO, *Human Capital: Quality of DOD Status of Forces Surveys Could Be Improved by Performing Nonresponse Analysis of the Results*, [GAO-10-751R](#) (Washington, D.C.: July 12, 2010).

Some Data Are Available
Outside of DOD on
Servicemembers' Use of Food
Assistance

We also identified other agencies and organizations outside of DOD that have access to, or are in a position to collect, data on food assistance used by active-duty servicemembers and their families. *Standards for Internal Control in the Federal Government* state that management should communicate with external parties regarding quality information needed to achieve objectives.²⁵ In addition, DOD Instruction 1342.22 specifies that family readiness services shall be provided through a system that maximizes the network of agencies, programs, services, and individuals in a collaborative manner to promote military family readiness.²⁶ The instruction further states that family readiness services shall promote interagency collaboration and service coordination within and among federal and non-federal entities to identify and achieve common family readiness goals and improve communication among service providers and with servicemembers and their families.

While DOD could benefit from more complete information on servicemembers' use of food assistance, none of the DOD officials we met were aware of any efforts by the department to coordinate with agencies, such as the USDA, to collect and share relevant data on food assistance. Specifically, we contacted multiple offices within USD (P&R) to obtain data on the use of food assistance programs, including the offices for Military Compensation, Military Community & Family Policy, Defense Commissary Agency, Defense Manpower Data Center, and the Defense Health Agency. We found that none of these offices had efforts to monitor or collect data on servicemembers' food assistance needs, including coordinating with USDA regarding collecting and sharing data or other relevant information. The USDA works through various state and local agencies to administer four of the five food assistance programs commonly used by active-duty servicemembers and their families, including: (1) SNAP, (2) WIC, (3) NSLP, and (4) SBP. A provision in the NDAA for fiscal year 2016 addressed DOD's access to information on SNAP usage by servicemembers. The NDAA for fiscal year 2016 calls for the USDA to ensure that any safeguards that prevent the use or

²⁵[GAO-14-704G](#). The standards were updated and went into effect on October 1, 2015. The current standards describe the need for quality information similar to the prior standards described in [GAO/AIMD-00-21.3.1](#), which were in effect prior to fiscal year 2016 and cover the time period of government agencies' data.

²⁶DOD Instruction 1342.22.

disclosure of information collected from SNAP recipients will not prevent the USDA from disclosing that information to DOD, or DOD using that information, for the purposes of determining the number of SNAP applicant households that contain one or more military servicemembers.²⁷ DOD provided us an email exchange that occurred in February to March 2016 discussing how to use the new authority provided in section 605 of the 2016 NDAA to obtain SNAP data. However, officials were not aware of further attempts to collect such information. According to results from the 2013 U.S. Census Bureau's annual American Community Survey (ACS), about 23,000 active-duty servicemembers²⁸ received SNAP benefits in the previous 12 months.²⁹ While it is known that servicemembers use food assistance programs and that information on recipients can be obtained, specific data on servicemembers' use of these programs are not available because there is no requirement or need that has been established for agencies such as the USDA to collect such information. For example, during visits to four selected military installations,³⁰ we met with local administrators of USDA food assistance

²⁷National Defense Authorization Act for Fiscal Year 2016, Pub. L. No. 114-92, § 605 (2015).

²⁸The estimate is based on responses to the question, "In the past 12 months, did you or any member of this household receive benefits from the Food Stamp Program or SNAP?" The survey did not count members of the military serving overseas. Further, if a member of the military was serving overseas and his or her family was living stateside, the member of the military would not be listed in the household and therefore would not count in the family for this survey. There are some additional limitations to this estimate such as if a servicemember was living off base with a roommate who received SNAP benefits, the survey would count that servicemember as living in a household receiving SNAP benefits even though the member really did not receive SNAP benefits himself or herself. Also, the estimate did not differentiate between servicemembers who received SNAP benefits while in the military from those who received SNAP benefits prior to joining the military. Active-duty military members living in housing units who received SNAP benefits in the past 12 months or those living in group quarters who personally received SNAP benefits in the past 12 months as measured in the ACS: 23,205 (margin of error is +/- 3,347). Total active-duty military members measured in the ACS: 963,220 (margin of error is +/- 16,171).

²⁹According to the USDA, in an average month during fiscal year 2013, SNAP provided benefits to 47.6 million people living in nearly 23.1 million households across the United States. See U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2013*, Report No. SNAP-14-CHAR (Alexandria, Va; December 2014).

³⁰We visited Fort Hood, Texas; Altus Air Force Base, Oklahoma; Naval Base San Diego, California; and Camp Pendleton, California.

programs who told us that they are able to identify servicemembers through required documentation such as a Leave and Earnings Statement that will identify if an individual is a member of the U.S. military. However, officials said that they do not ask about or routinely document an applicant's military status since it does not have a bearing on their eligibility for assistance.

We also spoke with representatives from charitable organizations located on the installations that we visited who have information that DOD could use to gain insights into the needs of its servicemembers. For example, we spoke with representatives from Army Emergency Relief, the Navy-Marine Corps Relief Society, and the Air Force Aid Society—each of which offers various types of support, including financial support to purchase food for servicemembers in need. Army Emergency Relief and the Air Force Aid Society track the amount provided for food assistance. Specifically, an official with Army Emergency Relief told us that the organization provided \$2.3 million in food assistance to active-duty servicemembers in calendar year 2015, \$2.7 million in calendar year 2014, and \$1.8 million in calendar year 2013. According to an official with the Air Force Aid Society, the organization provided \$300,000 in food assistance in fiscal year 2015, and \$600,000 in each of the previous two years.

During our site visits, we also visited volunteer-run food pantries and food distribution operations of varying sizes that were started to address a locally-identified need. For example, during our site visit to Altus Air Force Base, Oklahoma, we visited a pantry that provides free food to anyone in need, but it does not track the number of individuals served. We also visited a food pantry on Fort Hood in Texas that Army officials told us responded to 508 separate requests for food from active-duty servicemembers, retirees, and their family members in fiscal year 2015. Of the four military installations, Marine Corps Base Camp Pendleton in California had the largest and most organized of the food distribution operations that we visited. Specifically, during our visit to the base in December 2015, we identified four food pantries that distribute food on specific days of the month around Camp Pendleton. The manager of one pantry told us that its operation alone provides food assistance each month to an average of 400 to 500 military families on Camp Pendleton. Without coordination with USDA, and considering outreach to other organizations that have data on servicemembers' use of food assistance, DOD will miss the opportunity to collect more complete data and information on the needs of its servicemembers.

DOD Has Not Assigned Department-Level Responsibilities for Monitoring the Use of Food Assistance Programs

DOD has not assigned department-level responsibilities, such as a collateral duty within the Office of the USD (P&R), for monitoring the use of food assistance programs by active-duty servicemembers and their families. *Standards for Internal Control in the Federal Government* state that management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.³¹ We contacted multiple offices within USD (P&R) to obtain data on the use of food assistance programs, including Military Compensation, Military Community & Family Policy, Defense Commissary Agency, Defense Manpower Data Center, and Defense Health Agency. None of these offices was responsible for monitoring servicemembers' use of food assistance programs with the exception of FSSA and the meals provided under NSLP and SBP at DODEA schools. Further, to better understand the purpose of DOD's survey questions on food assistance and how any resulting data are used, we spoke with the Defense Manpower Data Center official involved in developing DOD's Status of Forces Survey who told us that different offices within USD P&R are responsible for developing questions that relate to their particular mission. The official referred us to the Military Community and Family Policy office within USD (P&R) for the survey questions related to servicemembers' use of food assistance programs. However, officials were not able to identify any official or office that had responsibility for or knowledge about why or how these questions are used, omitted, or changed from survey year to survey year. In general, DOD officials could not identify an office with responsibility for reviewing and updating the questions on food assistance asked in the Status of Forces Survey.

Without collecting more data and determining whether DOD should assign department-level responsibility for monitoring servicemembers' use of food assistance programs, DOD will not have a good understanding of the prevalence of need among servicemembers. Moreover, assigning department-level responsibility for monitoring food assistance needs could provide DOD with the ability to coordinate the military services' collection and analysis of relevant data and determine

³¹[GAO/AIMD-00-21.3.1](#). These standards were in effect prior to fiscal year 2016 and cover the time period of government agencies' data. The standards were subsequently updated and similarly require management to establish the same organization elements. The updated standards went into effect on October 1, 2015; see [GAO-14-704G](#).

what actions may be needed to address the needs of the servicemembers and their families.

Military Officials at Selected Installations Cited Challenges Affecting Servicemembers Who Seek Food Assistance Benefits

Military service officials at all four of the military installations that we visited described challenges that servicemembers may experience when seeking food assistance benefits, and stated they have been addressing the challenges by continuing to refer interested servicemembers to potential assistance from government food assistance programs and charitable organizations. Some of the challenges mentioned during our group interviews at each of the four military installations that we visited were: (1) limited awareness of some food assistance programs (2) stigma associated with receiving food assistance; and (3) misconceptions about military compensation and the ability of a servicemember to qualify for food assistance.

Limited Awareness of Food Assistance Programs

Military service officials who assist servicemembers and their families at all four of the installations we visited generally had knowledge of some food assistance programs administered by USDA, such as SNAP and WIC. However, we found that some of the military officials at three of the four installations we visited were not aware of the FSSA food assistance program even though it is administered by DOD. Those who were aware of FSSA said that they had not referred many servicemembers to the program because it is more difficult to qualify for than SNAP. For example, at one military installation, the officials told us that no applicant has been able to qualify for FSSA. In addition, the military officials told us that they assisted servicemembers who were also not aware of some food assistance programs, such as foodbanks, SNAP, and particularly FSSA.

Stigma for Those Receiving Food Assistance

Military service officials at three of the four selected installations we visited stated that they believe a societal stigma exists generally for those who use food assistance. Officials at one installation added that the self-sufficient culture of the military can make these stigmas even more pronounced for servicemembers who receive food assistance from, for example, SNAP, and to a lesser degree from charitable organizations and food pantries. In contrast, these officials said that there seems to be no stigma with regard to receiving WIC benefits, which suggest that WIC is seen as more of a health and nutrition benefit rather than a program for those with financial and food assistance needs. Officials added that WIC is advertised more than other food assistance programs; in some cases

there have been proactive efforts to promote the program by including WIC representatives at military briefings to inform and encourage servicemembers to apply if they are expecting or have small children.

Misconceptions About Military Compensation and Income Eligibility Requirements for Food Assistance

Military officials at all four of the installations we visited cited misconceptions about military compensation relative to income eligibility requirements for food assistance programs as another challenge that may deter servicemembers in need from seeking such assistance. For example, some military officials at one installation who are in a position to refer servicemembers to food assistance programs sometimes do not because they mistakenly assume that a potential recipient's income exceeds eligibility requirements for such programs.

The BAH benefit also plays a role in a servicemember's eligibility for food assistance and may contribute to misconceptions about eligibility and a servicemember's decision to apply for such programs. For example, a program such as SNAP counts the amount a servicemember receives in BAH as part of one's income when determining eligibility for benefits, while other programs, such as WIC, do not count BAH as income. Also, the amount of a servicemember's BAH benefit is affected by location, meaning that the same servicemember may qualify for food assistance at one location but not be eligible at another location with a higher housing benefit. For example, a servicemember stationed at Altus Air Force Base, Oklahoma, would have a BAH rate of \$789, that, when combined with one's basic pay, may result in a level of income that is low enough to qualify for food assistance.³² However, if that same servicemember transferred to San Diego, California, which has a BAH rate of \$2,178, the servicemember may no longer have income low enough to qualify for food assistance programs for which he or she was previously eligible.³³

Military service officials we interviewed at all four of the installations we visited suggested that BAH makes it difficult to qualify when determining eligibility for SNAP in part because a servicemember's ability to qualify for SNAP can be affected by the inclusion of BAH. Currently, U.S. code requires all income, regardless of the source, to be considered when

³²Altus, Oklahoma BAH rate (with dependents) is as of 2015.

³³San Diego, California BAH rate (with dependents) is as of 2015.

determining eligibility for SNAP unless specifically excluded by law, and BAH is not excluded by law. Further, the U.S. Code defines regular military compensation to include BAH and DOD's description of military pay and compensation includes BAH.³⁴ On January 12, 2016, the Chief Executive Officer for MAZON,³⁵ a national nonprofit organization working to end hunger, testified to the House Committee on Agriculture, Subcommittee on Nutrition, that many lower ranking servicemembers are made ineligible for SNAP because their housing allowance is counted as income.³⁶ MAZON contended that since BAH is excluded as income for the purposes of calculating income taxes and eligibility for some federal programs, such as Head Start, that BAH should be excluded as income for the purposes of determining eligibility for all food assistance programs.³⁷ MAZON maintains that treating the BAH benefit as income for determining eligibility for SNAP puts some military families at an unfair disadvantage and disqualifies them from receiving food assistance.

Conclusions

Military families facing financial hardship have access to government and charitable food assistance programs. As the administrator of FSSA and through the Status of Forces Survey that it periodically conducts, DOD has some data on the use of food assistance programs by active-duty servicemembers and their families. However, the survey is of limited usefulness because it does not address all the food assistance programs that servicemembers use. In addition, based on our interviews with DOD officials, DOD has not coordinated with and leveraged the information and access that other agencies, such as the USDA, have on servicemembers' use of food assistance. USDA's role as one of the primary administrators of food assistance programs in the U.S. is one source of information that

³⁴37 U.S.C. § 101(25).

³⁵MAZON: A Jewish Response to Hunger is a national nonprofit organization working to end hunger among people of all faiths and backgrounds in the United States and Israel.

³⁶*Past, Present, and Future of SNAP: Addressing Special Populations: Hearing Before the Subcomm. on Nutrition of the H. Comm. on Agriculture*, 114th Cong. (2016) (statement of Abby J. Leibman, President and CEO, MAZON).

³⁷The Head Start program, overseen by the Department of Health and Human Services' Administration for Children and Families and administered by the Office of Head Start (OHS), is one of the largest federal early childhood programs. Head Start promotes the school readiness of young children from low-income families through agencies in their local community.

DOD could use to better understand the extent to which such programs are used by active-duty servicemembers and their families. Without more complete data and determining whether it needs to assign specific department-level responsibility within DOD for monitoring food assistance use, DOD will continue to have a limited understanding of servicemembers' food assistance needs and whether further actions are needed to help ensure that the basic needs of servicemembers and their families are met and that any existing gaps are not related to their service in the military.

Recommendations for Executive Action

To more fully understand the food assistance needs that exist for active-duty servicemembers and their families, and to help ensure that DOD effectively targets its support to those in need of assistance, we recommend that the Secretary of Defense direct the Office of the Under Secretary of Defense for Personnel and Readiness to take the following two actions:

- Revise, as appropriate, any existing data-collection mechanisms, such as periodic surveys, to collect and analyze more complete data on the use of food assistance programs by servicemembers and their families and use the data to determine if any further actions are needed, such as assigning responsibilities at the department-level for monitoring the use of food assistance programs by active-duty servicemembers; and,
- Coordinate with USDA to leverage its access to data on active-duty servicemembers and their families who use its programs and services and consider outreaching to other organizations that have data on servicemembers' use of food assistance.

Agency Comments and Our Evaluation

We provided a draft of this report to DOD for review and comment. In its written comments, reproduced in appendix IV, DOD concurred with our first recommendation and partially concurred with our second recommendation.

Specifically, DOD concurred with our first recommendation to revise, as appropriate, any existing data-collection mechanisms, such as periodic surveys, to collect and analyze more complete data on the use of food assistance programs by servicemembers and their families, and use the data to determine if any further actions are needed, such as assigning responsibilities at the department-level for monitoring the use of food assistance programs by active-duty servicemembers.

DOD partially concurred with our second recommendation, to coordinate with USDA to leverage its access to data on active-duty servicemembers and their families who use its programs and services and consider outreaching to other organizations that have data on servicemembers' use of food assistance. DOD noted in its comments that it concurred with most of the findings regarding visibility on servicemembers receiving food assistance programs but non-concurred with our statement that DOD has not coordinated with USDA to access its data on servicemember use of programs it administers. DOD stated that it has tried, for several years, to obtain SNAP data from USDA and that although the National Defense Authorization Act for Fiscal Year 2016 clarified that existing safeguards on SNAP recipient data do not prevent the disclosure of such information to DOD, it also did not mandate that USDA provide the data. Further, DOD stated that the Defense Manpower Data Center has been in contact with USDA to set up data exchange agreements, but that it has been unable to identify one source within USDA from which to obtain these data.

We are encouraged by DOD's recent efforts to work with USDA to obtain data that would provide the department with greater insight into the needs of its servicemembers. However, during the course of this review we spoke with DOD officials—on multiple occasions—in the Office of the Deputy Assistant Secretary of Defense for Military Community and Family Policy, the Office of the Under Secretary of Defense for Personnel and Readiness' Military Compensation office, and at the Defense Manpower Data Center, among others, to discuss the department's efforts to monitor servicemembers' food assistance needs. We consistently found officials to be unaware of any previous such efforts by DOD until after passage of the National Defense Authorization Act for Fiscal Year 2016 when we were provided, as noted in our report, an email exchange that occurred in February to March 2016 discussing how to use the new authority to obtain SNAP data. Importantly, no DOD official with whom we met believed that their office was responsible for such coordination with USDA.

Furthermore, following the receipt of DOD's comments on our draft report, we contacted the Office of Assistant Secretary of Defense, Manpower and Reserve Affairs to further inquire about the efforts it noted had previously been taken to obtain data from USDA. Specifically, we spoke with an official in that office who stated that three or four years earlier DOD tried to obtain data from USDA on servicemembers' use of SNAP, but were unsuccessful. We requested, but DOD did not provide us with, any additional documentation to confirm this or other efforts to coordinate

with USDA to access its data. We also recognize the inherent complexity of interagency coordination and believe DOD should continue its dialogue with USDA about ways in which it can leverage their access to data that would provide valuable insights into servicemembers' needs.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense; the Secretary of Agriculture; the Secretaries of the Army, the Navy, and the Air Force; the Commandant of the Marine Corps; and the Under Secretary of Defense for Personnel and Readiness. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff has any questions about this report, please contact me at (202) 512-3604 or farrellb@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff members who made key contributions to this report are listed in appendix V.



Brenda S. Farrell
Director, Defense Capabilities and Management

List of Committees

The Honorable Pat Roberts
Chairman
The Honorable Debbie Stabenow
Ranking Member
Committee on Agriculture, Nutrition, and Forestry
United States Senate

The Honorable Mac Thornberry
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

Appendix I: Scope and Methodology

Our review focused on the food assistance programs available to active-duty servicemembers from the four military services—Army, Navy, Marine Corps, and Air Force—and their families. To assess the extent to which active-duty servicemembers and their families have access to government and charitable food assistance programs, we reviewed various reports and documents to identify federal government programs that focus primarily on providing food and nutrition assistance to low-income individuals and households. The reports and documents included: our related report, *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*; our related testimony, *Domestic Food Assistance: Multiple Programs Benefit Millions of Americans, but Additional Action Is Needed to Address Potential Overlap and Inefficiencies*,¹ and a Congressional Research Service report on domestic food assistance programs, *Domestic Food Assistance: Summary of Programs*.² For the purpose of this engagement, we focused on government and charitable food assistance programs available to active-duty servicemembers and their families who are assigned to installations within the continental United States. We interviewed officials from United States Department of Agriculture (USDA) and Department of Defense (DOD) to identify food assistance programs available to active-duty servicemembers and their families. Further, we interviewed officials who administer these programs at the federal, state, and local levels to obtain additional background information and confirm the availability and completeness of the food assistance programs we identified. To find charitable organizations that provide food assistance to active-duty servicemembers and their families, we interviewed officials from each of the military services who identified the following charities that support servicemembers and families: Army Emergency Relief, Air Force Aid Society, and Navy-Marine Corps Relief Society. Further, we conducted internet searches to identify charitable food pantries operating on military

¹See GAO, *Domestic Food Assistance: Multiple Programs Benefit Millions of Americans, but Additional Action Is Needed to Address Potential Overlap and Inefficiencies*, [GAO-15-606T](#) (Washington, D.C.: May 20, 2015) and *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*, [GAO-10-346](#) (Washington, D.C.: Apr. 15, 2010).

²Congressional Research Service, *Domestic Food Assistance: Summary of Programs* (Feb. 4, 2015).

installations, and when one was located, we contacted local military service officials to confirm its existence.

To assess the extent to which there was any variation in eligibility requirements for government food assistance programs, we reviewed the laws that established selected food assistance programs and analyzed eligibility criteria for these programs and used those eligibility criteria to develop scenarios to illustrate situations in which a servicemember would or would not qualify for these food assistance programs.³ Specifically, we conducted an analysis to show what a servicemember in the paygrade of E-4 needs to meet the income eligibility requirements for Family Subsistence Supplemental Allowance (FSSA), Supplemental Nutrition Assistance Program (SNAP), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), National School Lunch Program (NSLP), and School Breakfast Program (SBP) at the four military installations we visited. We selected the paygrade of E-4 because these servicemembers are junior enlisted personnel and as such are at the lower end of the pay scale for active-duty servicemembers. Also, FSSA program data for calendar year 2014 showed that the E-4 paygrade was the most frequent paygrade to receive this allowance, suggesting that personnel at this paygrade have a need for assistance. In calculating the servicemember's income, we included only three types of military pay: Basic Pay, Basic Allowance for Subsistence (BAS), and Basic Allowance for Housing (BAH) with dependent rate. We included these elements of military pay because active-duty servicemembers who are entitled to basic pay are also entitled to BAS and BAH. We did not include other military pay and allowances because active-duty servicemembers are not necessarily eligible for the other pay and allowances. Further, our analysis is based on the assumption that the only source of income for the household is the servicemembers' military pay. Next, we reviewed relevant federal statutes to determine the income criteria for each of the programs and what types of military pay and allowances are included in active-duty servicemembers' income when applying to one of these food assistance programs. Since federal law provides states some discretion in setting the income criteria for some of the food assistance programs and deciding what portion of military pay is included in income, we

³The statutes we reviewed were 7 U.S.C. § 2014 (SNAP), 37 U.S.C. § 402a (FSSA), and 42 U.S.C. §§ 1758 (NSLP), 1773 (SBP), and 1786 (WIC).

interviewed state officials to determine how they calculated the income of active-duty servicemembers and what specific income criteria they employ. The state's income criteria are on a graduated scale that as the household size increases, the income level to qualify for benefits also increases. We compared the income of a servicemember in the paygrade of E-4 to the income criteria used by the state and determined how large a household the servicemember needed in order to qualify given his/her income.

To determine the household size required to qualify for SNAP benefits, we made additional calculations with several assumptions. Applicants for SNAP must pass a two-income test, a gross-income test and a net-income test. Most households must meet gross- and net-income tests, but a household with an elderly person or a person who is receiving certain types of disability payments has to meet only the net-income test. We based our analysis on the assumption that the servicemembers had to pass both the gross- and net-income tests. To calculate net income, SNAP allows taking a number of deductions from the household income. In conducting our analysis, we assumed that the household does not include any elderly or disabled persons, there were no dependent care, medical expenses, or child-support deductions, the monthly rent or mortgage payment equaled the servicemember's BAH, and the standard utility allowance was appropriate to use in the calculations. We had state or local officials responsible for the SNAP program in their area review our calculations to ensure they were correct.

To assess the extent to which DOD has identified that active-duty servicemembers and their families use food assistance programs, we interviewed officials from multiple offices within Under Secretary of Defense for Personnel and Readiness (USD (P&R)) to determine which office(s) had department-level responsibilities related to active-duty servicemembers' use of food assistance programs and to obtain any relevant data on servicemembers' use of these programs. We reviewed DOD documents on the organization and assigned responsibilities of USD (P&R). We obtained and reviewed the results of recent surveys completed by active-duty servicemembers that include questions about the use of food assistance programs. Specifically, we obtained and reviewed DOD's Status of Forces Survey of Active Duty Members for calendar year 2010, 2012, and 2013, the U.S. Census Bureau's 2013 American Community Survey, FSSA data from the Defense Joint Military Pay System, and data on the number of students in DOD Education Activity (DODEA) schools who were eligible to receive free and/or reduced-price meals. We assessed the reliability of this information by

interviewing responsible officials and, in the case of the Status of Forces Survey, reviewing documentation of the survey's methodology. We found this information to be sufficiently reliable for the purpose of reporting DOD's awareness of military participants receiving these benefits. Also, we compared the data collection and communications processes for DOD with *Standards for Internal Control in the Federal Government*, which state that management should obtain quality information to achieve its objectives and that it should communicate with external parties regarding the information that is needed to achieve its objectives.⁴ To obtain information on other food assistance programs available to servicemembers and their families for which data were not available, we visited four military installations in the United States and interviewed officials who administer these programs, officials who assist servicemembers in need, and visited food pantries, if any, on the installation. We selected sites to represent each of the military services. We then refined our site selections to include: locations with a large population of servicemembers and dependents, a range of cost-of-living areas (using the BAH rates), and the presence of a food pantry and/or a WIC program office on the military installation. Specifically, we visited Fort Hood, Texas; Altus Air Force Base, Oklahoma; Naval Base San Diego, California; and Camp Pendleton, California. In addition, we visited and interviewed state and local officials who oversee non-military food assistance programs at these four geographic locations. Finally, we interviewed officials from the Navy-Marine Corps Relief Society, Army Emergency Relief, and the Air Force Aid Society to learn what food assistance they provide to active-duty servicemembers and their families.

To identify any challenges that active-duty servicemembers encounter when seeking food assistance, we interviewed military service officials who assist servicemembers in need of financial assistance, including food assistance, to gain their perspectives on any challenges that may be faced by servicemembers attempting to obtain such assistance. Specifically, we interviewed military Chaplains, First Sergeants and

⁴See GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999). These standards were in effect prior to fiscal year 2016 and cover the time period of government agencies' data. The standards were subsequently updated. The updated standards went into effect on October 1, 2015. See GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

Command Master Chiefs, financial specialists, and officials from charitable military organizations, including the Navy-Marine Corps Relief Society, the Air Force Aid Society, and Army Emergency Relief. We also interviewed private and local government officials who assist servicemembers with food assistance, such as SNAP, WIC, summer-meals programs, and food pantries. Further, we interviewed representatives from advocacy groups who support active-duty families or try to reduce hunger in America.

Table 2 contains a list of organizations, offices, and military installations we visited or contacted during our review.

Table 2: Organizations, Offices, and Military Installations Visited or Contacted

Department of Defense	<ul style="list-style-type: none"> • Military Compensation, Military Personnel Policy, Office of the Under Secretary for Personnel and Readiness, Washington, D.C. • Office of the Deputy Assistant Secretary of Defense for Military Community and Family Policy, Washington, D.C. • DOD Education Activity, Alexandria, Virginia • Deputy Assistant Secretary of Defense (Force Readiness), Washington, D.C. • Defense Research, Surveys, and Statistics Center, Defense Manpower Data Center, Alexandria, Virginia • Defense Commissary Agency, Washington, D.C.
Army	<ul style="list-style-type: none"> • Fort Hood, Texas • Office of the Assistant Secretary of the Army, Manpower and Reserve Affairs, Washington, D.C.
Air Force	<ul style="list-style-type: none"> • Altus Air Force Base, Oklahoma • U.S. Air Force Headquarters, Airman & Family Care Division, Air Force Services Directorate, Washington, D.C. • U.S. Air Force Headquarters, Services Operations Division, Sustainment Branch, Washington, D.C.
Navy	<ul style="list-style-type: none"> • Naval Base San Diego, California • Fleet and Family Support Programs, Commander, Navy Installations Command, Washington, D.C.
Marine Corps	<ul style="list-style-type: none"> • Marine Corps Base Camp Pendleton, California • Marine and Family Programs Division, Headquarters Marine Corps, Quantico, Virginia
Department of Commerce	<ul style="list-style-type: none"> • American Community Survey Office, U.S. Census Bureau, Suitland, Maryland
Department of Agriculture	<ul style="list-style-type: none"> • Food and Nutrition Service, Alexandria, Virginia
State agencies	<ul style="list-style-type: none"> • California Department of Social Services, Sacramento, California • Oklahoma Department of Human Services, Oklahoma City, Oklahoma • Texas Department of State Health Services, Austin, Texas • Texas Health and Human Services Commission, Austin, Texas

Local government agencies	<ul style="list-style-type: none"> • CalFresh Eligibility Operations, Health & Human Services Agency, San Diego County, San Diego, California • American Red Cross, Women, Infants, & Children Program, San Diego, California • Jackson County Health Department, Altus, Oklahoma • Region 2, District 3 (Greer, Harmon, Jackson, Kiowa, and Tillman Counties), Oklahoma Department of Human Services, Altus, Oklahoma • Bell County Public Health District, WIC Program, Fort Hood, Texas • Office of Eligibility Services, Texas Health and Human Services Commission, Killeen, Texas
Charitable organizations	<ul style="list-style-type: none"> • Army Emergency Relief, Alexandria, Virginia • Bay Area Food Bank, Theodore, Alabama • Feeding America, Chicago, Illinois • Feeding South Dakota, Sioux Falls, South Dakota • Foodbank of Southeastern Virginia, Norfolk, Virginia • Jewish Family Service of San Diego, San Diego, California • National Military Family Association, Alexandria, Virginia • Navy-Marine Corps Relief Society, San Diego, California • Regional Food Bank of Oklahoma, Oklahoma City, Oklahoma • Second Harvest Food Bank of Southeast North Carolina, Fayetteville, North Carolina
Other	<ul style="list-style-type: none"> • Military Compensation and Retirement Modernization Commission, Arlington, Virginia

Source: GAO. I GAO-16-561

We conducted this performance audit from July 2015 to July 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Listing of Selected Federal Food and Nutrition Assistance Programs

In our April 2010 report, we identified 18 programs that focus primarily on providing food and nutrition assistance to low-income individuals and households (see table 3).¹ Federal food assistance programs provide different types of food benefits to address a variety of needs through a decentralized service delivery structure of federal, state, and local agencies and nonprofit organizations. In May 2015, we testified before Congress that in fiscal year 2014 the four largest food assistance programs—Supplemental Nutrition Assistance Program (SNAP), the National School Lunch Program, the Special Supplemental Nutrition Program for Women, Infants, and Children, and the School Breakfast Program—accounted for 93 percent of total spending on the 18 programs.² We further testified that SNAP, the largest program, accounted for more than 70 percent of the overall spending total. Fifteen of the programs are administered by the U.S. Department of Agriculture, one program is administered by the Department of Homeland Security's Federal Emergency Management Agency, and two programs are administered by the Health and Human Services' Administration on Aging.

¹GAO, *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*, [GAO-10-346](#) (Washington, D.C.: Apr. 15, 2010).

²GAO, *Domestic Food Assistance: Multiple Programs Benefit Millions of Americans, but Additional Action is Needed to Address Potential Overlap and Inefficiencies*, [GAO-15-606T](#) (Washington, D.C.: May 20, 2015).

**Appendix II: Listing of Selected Federal Food
and Nutrition Assistance Programs**

Table 3: Selected Federal Food and Nutrition Assistance Programs, by Agency

Program	Target population	Benefit type	Participation (approx.)^a
U.S. Department of Agriculture			
Child and Adult Care Food Program	Children in certain nonresidential child care centers, family, or group day care; children in after-school programs in low-income areas, or residing in emergency shelters; and chronically impaired disabled adults and persons 60 years or older in adult day care centers.	Reimburse local providers (child-care centers, adult day-care centers, etc.) for meals and snacks served.	An average of 3.6 million children and adults was served daily in fiscal year 2014.
Commodity Supplemental Food Program	Low-income persons 60 years or older. Low-income pregnant, postpartum, and breastfeeding women, infants, and children up to age 6 who were receiving benefits as of February 6, 2014—can continue to receive assistance until they are no longer eligible.	Supplemental foods, in the form of USDA commodities, are provided in food packages to individuals.	An average of 573,703 people was served monthly in fiscal year 2014, including 9,996 women, infants, and children, and 563,707 elderly participants.
Community Food Projects Competitive Grant Program	Low-income individuals in participating communities.	Matching grants made to organizations to plan and implement projects to improve access of low-income community members to food/nutrition, increase the self-reliance of communities in providing for their own needs, and promote comprehensive responses to local food, farm, and nutrition issues.	26 projects were funded in fiscal year 2013.
Food Distribution Program on Indian Reservations	American Indian and non-Indian households that reside on a reservation and Indian households living in an otherwise designated area, and recognized as having inadequate income and resources.	Food is provided to qualifying households.	An average of 85,400 participants was served monthly in fiscal year 2014.
Fresh Fruit and Vegetable Program	Elementary school children in designated schools with a high percentage of students eligible for free or reduced-price meals.	Reimburse local providers (elementary schools) for fresh fruit and vegetable snacks served free to students outside of breakfast or lunch periods.	Students in more than 7,100 schools during the 2011-2012 school year.

**Appendix II: Listing of Selected Federal Food
and Nutrition Assistance Programs**

National School Lunch Program	Students from families with incomes below 130 percent of the federal poverty level (or from families receiving SNAP) qualify for free meals, and students from families with incomes below 185 percent of the federal poverty level qualify for reduced-price meals.	Cash grants and food donations are provided to reimburse local providers (schools) for meals and snacks served. Schools must agree to serve free and reduced-price meals to eligible children.	An average of 30.3 million students was served daily in fiscal year 2014.
Nutrition Assistance for Puerto Rico	Needy persons living in the Commonwealth of Puerto Rico.	Nutrition assistance benefits provided via Electronic Benefit Transfer (EBT) cards to needy persons for the purchase of food at authorized retailers.	An average of 1.35 million individuals was served monthly in fiscal year 2014.
School Breakfast Program	Eligible children in schools and residential child-care institutions. Children whose families meet income eligibility guidelines qualify for free or reduced-price breakfasts.	Reimburse local providers (schools and residential child-care institutions) for breakfasts served.	An average of 13.5 million students was served daily in fiscal year 2014.
Senior Farmers' Market Nutrition Program	Low-income seniors	Benefits can be used to purchase fresh fruits, vegetables, and herbs at authorized farmers' markets, roadside stands, and community supported agriculture programs.	787,139 low-income seniors were served in fiscal year 2014.
Special Milk Program	Children in schools, of high school grade or under, child-care institutions, and similar nonprofit institutions that do not participate in other federal meal service programs, including the National School Lunch or School Breakfast Programs.	Formula grant, reimbursing cost of milk for children in schools, camps, and other programs that do not participate in other child nutrition programs.	3,868 schools, non-residential child-care institutions, and summer camps participated, and 49.9 million half-pints were served in fiscal year 2014.
Summer Food Service Program	Children from needy areas during summer break or school vacations.	Reimburse local providers (schools, government agencies, and nonprofit organizations) for meals and snacks served in programs during breaks in school year.	During July 2014, 2.63 million children participated on an average day.
Supplemental Nutrition Assistance Program (SNAP)	Low-income individuals and households with gross income at or below 130 percent of federal poverty level or net income at or below 100 percent of the poverty level and with limited resources.	Benefits provided to households through electronic debit card for food purchase in participating retail stores.	An average of 46.3 million people was served monthly in fiscal year 2014.

**Appendix II: Listing of Selected Federal Food
and Nutrition Assistance Programs**

The Emergency Food Assistance Program	Needy individuals, such as those who may be homeless or participate in welfare programs.	Commodity foods are distributed through state agencies to food banks and other agencies, which provide food to local organizations, such as soup kitchens and food pantries, or directly provide the foods to needy households.	USDA entitlement and bonus commodity foods valued at over \$566 million delivered to states for distribution in fiscal year 2014.
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	Low-income infants, children to age 5, and women who are pregnant, postpartum, and breastfeeding and who are determined to be at nutritional risk.	Check, voucher, or electronic benefit transfer benefits provided to recipients to pay for supplemental foods, and provide nutrition education and health care referrals for participants. Some state agencies distribute WIC foods directly to recipients through warehouses or home delivery.	An average of 8.3 million women, infants, and children was served monthly in fiscal year 2014.
WIC Farmers' Market Nutrition Program	WIC participants and those on a waiting list to receive WIC benefits (Low-income infants, children to age 5, and women who are pregnant, postpartum, and breastfeeding and who are determined to be at nutritional risk).	Coupons provided for purchase of fresh fruits and vegetables at certified farmers' markets.	Over 1.6 million women, infants, and children were served in fiscal year 2014.
Department of Homeland Security's Federal Emergency Management Agency			
Emergency Food and Shelter Program	Homeless individuals.	Funds provided to private and independent nonprofit or public organizations (such as community action agencies, food banks, and food pantries) to provide emergency food and shelter to families and individuals in need of assistance.	More than 52 million meals were provided in fiscal year 2014
Health and Human Services' Administration on Aging			
Elderly Nutrition Program: Home-Delivered and Congregate Nutrition Services	Individuals 60 years of age and older and their spouses, especially those with the greatest social or economic need, and in certain cases, under age 60 if the individual is disabled and accompanies an older individual to meals. Special focus is given to those with greatest economic or social need, including low-income minorities and those residing in rural areas.	Supports the provision of nutritious meals (with education and other services) served in a congregate setting or delivered to the home, if individual is homebound.	More than 830,000 individuals received home-delivered meals and 1.6 million seniors received congregate meals in fiscal year 2013.

**Appendix II: Listing of Selected Federal Food
and Nutrition Assistance Programs**

Grants to American Indian, Alaska Native, and Native Hawaiian organizations for nutrition and supportive services	American Indians, Alaska Natives, and Native Hawaiians who are at least 60 years old and their spouses (or those designated as older Indian by tribal authorities).	Grants are provided to tribal organizations to fund services including nutrition and supportive services, similar to those in the Elderly Nutrition Program: Home-Delivered and Congregate Nutrition Services.	25,192 American Indian elders received home-delivered meals and 52,137 received congregate meals in fiscal year 2013.
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Source: GAO. | GAO-16-561

^aParticipation information varies by program because some programs provide benefits to individuals while others provide a service or meal.

Appendix III: Eligibility Requirements for Food Assistance Programs Commonly Used by Active-Duty Servicemembers and Their Families

We obtained copies of eligibility requirements for government food assistance programs that applicants—whether military or civilian—must meet to receive benefits, and this appendix summarizes requirements for the five programs commonly used by servicemembers and families. In this report, we describe income requirements and how income affects active-duty servicemembers' eligibility for government food assistance programs. In addition to the income requirements, each of these programs has other requirements that must be met before one may receive benefits or, in some cases, provisions for specific groups to receive benefits without regard to the other eligibility requirements. The requirements for the five programs we found that servicemembers and families use are described below.

Family Subsistence Supplemental Allowance (FSSA)

Title 37, section 402a of the U.S. Code and DOD Instruction 1341.11 require members of the military services serving on active duty to meet the following requirements to receive FSSA: income, Basic Allowance for Subsistence (BAS), pay status, dependents, and application.¹

- a. Income: The income of the servicemember, together with the income of the rest of the household (if any) of that servicemember, must be within 130 percent of the federal poverty guidelines.²
- b. BAS: Servicemembers must be receiving full or partial BAS.
- c. Pay status: Servicemembers must be in a pay status. When a servicemember is in a non-pay status for any reason, the servicemember is not eligible for FSSA during that non-pay period.
- d. Dependent: At least one person in the household of a servicemember must be a military dependent for that servicemember.³

¹Department of Defense Instruction 1341.11, *Family Subsistence Supplemental Allowance (FSSA) Program* (March 4, 2008).

²Household is defined as an individual who lives alone or who, while living with others, customarily purchases food and prepares meals for home consumption separate and apart from the others; or a group of individuals who live together and customarily purchase food and prepare meals together for home consumption.

- e. Application: Servicemembers must apply and be certified to receive the FSSA payment.

The National Defense Authorization Act for Fiscal Year 2016 limited FSSA eligibility to only those servicemembers serving outside the United States, the Commonwealth of Puerto Rico, the United States Virgin Islands, or Guam starting October 1, 2016.

Supplemental Nutrition Assistance Program (SNAP)

Eligibility requirements for SNAP benefits, as laid out in 7 U.S.C. §§ 2014 and 2015 and 7 C.F.R. Part 273, include criteria for financial resources, income, and employment.

- a. Resources: To be eligible for SNAP, households cannot have more than \$2,250 in countable resources, such as a bank account, or \$3,250 in countable resources if at least one person in the household is age 60 or older, or is disabled.⁴ However, certain resources are not counted, such as a home and lot, the resources of household members who receive Supplemental Security Income (SSI), the resources of household members who receive Temporary Assistance for Needy Families (TANF), and most retirement (pension) plans. States may determine whether to include the value of a vehicle in countable resources, if the state vehicle allowance standards would result in a household incurring a lower attribution of resources.
- b. Income: Most households must meet gross- and net-income tests, but a household with an elderly person or a person who is receiving certain types of disability payments has to meet only the

³Dependents are a servicemember's spouse; children who are unmarried and under age 21, or under age 23, if she or he is enrolled full-time in an institution of higher education and is in fact dependent on the member for more than one-half of his or her support, or who, regardless of age, are physically or mentally incapable of self-support, and is in fact dependent on the member for more than one-half of his or her support; dependent parents, including step and legally adoptive parents of the employee's spouse; and unmarried persons placed in the servicemember's legal custody, and has not reached age 21, or 23 if he or she is enrolled full time at an institution of higher learning, or is physically or mentally incapable of self-support.

⁴In the U.S. Code, section 2014(g)(1)(A)-(B) of Title 7 sets the maximum amount of a household's financial resources at \$2,000 (or at \$3,000 for a household with an elderly or disabled member), which is adjusted annually to the nearest \$250 increment to reflect changes in inflation.

net-income test. A household's gross income cannot exceed 130 percent of the federal poverty guidelines to receive SNAP benefits. Gross income means a household's total, non-excluded income, before any deductions have been made. A household's net income cannot exceed 100 percent of the federal poverty guidelines. According to the USDA, net income is gross income minus allowable deductions. Deductions allowed are:

- 20 percent of earned income;
 - a standard deduction of \$155 for household sizes of 1 to 3 people, and \$168 for a household size of 4 (higher for some larger households);
 - dependent-care expenses when needed for work, training, or education;
 - medical expenses for elderly or disabled members that are more than \$35 for the month if they are not paid by insurance or someone else;
 - legally owed child-support payments, if a state agency chooses not to exclude child-support payments from income;
 - and excess shelter costs that are more than half of the household's income after the other deductions. Allowable shelter costs include the cost of fuel to heat and cook with, cooling, electricity, water, service fees for one telephone, rent or mortgage payments and property taxes. The amount of the shelter deduction cannot be more than \$504 unless one person in the household is elderly or disabled. The limit is higher in Alaska, Hawaii and Guam. Some states allow homeless households to deduct a set amount (\$143) for shelter costs.
- c. Employment requirement: In general, people must meet work requirements to be eligible for SNAP. An applicant is ineligible for SNAP if the individual refuses to register for work, accept an offer of employment, or participate in an employment and training program required by a state agency, or the individual voluntarily, and without good cause, quits a job or reduces hours. In addition, able-bodied adults without dependents are required to work or participate in a work program for at least 20 hours per week to receive SNAP benefits for more than 3 months in a 36-month period. Some special groups—including children, seniors, pregnant women, and people who are exempt for physical or

mental health reasons—may not be subject to these requirements.

The federal law regarding SNAP provides an additional pathway for financial eligibility to SNAP. This federal law makes households in which all members are either eligible for or receive cash benefits from TANF, SSI, or state-financed General Assistance (GA) programs automatically eligible for SNAP.⁵ These households, which have already gone through eligibility determination for those programs, bypass the income and resource tests described above and are deemed financially eligible. Further, under expanded eligibility rules, called “broad-based categorical eligibility,” states can allow households receiving noncash services funded by TANF to be automatically eligible for SNAP. States that adopt a broad-based categorical eligibility policy may increase limits on household gross income up to 200 percent of federal poverty guidelines. However, categorically eligible households have their SNAP benefits determined under the same rules as other households, and while the household may be categorically eligible, its income may be too high to actually receive a SNAP benefit.

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

For WIC eligibility, as laid out in title 42, Section 1786 of the U.S. Code and 7 C.F.R. § 246.7, applicants must meet categorical, residential, income, and nutrition-risk requirements.

- a. Categorical requirement: The WIC program is designed to serve certain categories of individuals. Therefore, only the following categories of individuals are eligible for WIC:
 - Women:
 - Pregnant (women determined to have one or more fetuses in utero)
 - Postpartum (up to six months after the termination of pregnancy)
 - Breastfeeding (up to the infant’s first birthday)
 - Infants (up to the infant’s first birthday)

⁵7 U.S.C. § 2014(a).

- Children (between ages 1 and 5)
- b. Residential requirement: Applicants must live in the state in which they apply. At state agency option, applicants may be required to live in a local service area and apply at a WIC clinic that serves that area. Applicants are not required to live in the state or local service area for a certain amount of time in order to meet the WIC residency requirement.
- c. Income requirement: To be eligible for WIC, applicants must have income at or below an income level or standard set by the state agency or be determined automatically income-eligible based on participation in certain programs.
 - Income standard: The state agency's income standard must be between 100 percent and 185 percent of the federal poverty guidelines. According to U.S. Department of Agriculture (USDA) officials, all states have elected to raise the income standard to 185 percent of federal poverty guidelines.
 - Automatic Income eligible: Some applicants can be determined income eligible for WIC based on their participation in certain programs. These include:
 - individuals who are eligible to receive SNAP benefits, Medicaid, or TANF,
 - individuals who have certain family members eligible to receive Medicaid or TANF,
 - At state agency option, individuals who are eligible to participate in certain other state-administered programs.
- d. Nutrition-Risk Requirement: To be certified as eligible for WIC, applicants must be determined to be at nutritional risk.⁶ A competent professional authority, such as a physician, registered

⁶"Nutritional risk" means (A) detrimental or abnormal nutritional conditions detectable by biochemical or anthropometric measurements, (B) other documented nutritionally related medical conditions, (C) dietary deficiencies that impair or endanger health, (D) conditions that directly affect the nutritional health of a person, such as alcoholism or drug abuse, or (E) conditions that predispose persons to inadequate nutritional patterns or nutritionally related medical conditions, including, but not limited to, homelessness and migrancy. 42 U.S.C. § 1786(b)(8).

nurse, or nutritionist, makes that determination through a medical and/or nutritional assessment. Examples of medical-based conditions include anemia (low blood levels), underweight, or history of poor-pregnancy outcome. A dietary-based condition includes, for example, a poor diet.

National School Lunch Program (NSLP) and School Breakfast Program (SBP)

Sections 1758 and 1773 of Title 42 in the U.S. Code require that applicants must meet income requirements to receive free or reduced-price lunches or breakfasts at schools or be a member of a certain group. The NSLP and the SBP are two different programs but they have the same eligibility requirements.

- a. Household income requirement: Children are eligible to receive a free meal if their household income is at or below 130 percent of the federal poverty guidelines or a reduced-price meal if their household income is between 130 and at or below 185 percent of the federal poverty guidelines.
- b. Categorical (or automatic) eligibility requirement: Children are eligible to receive a free meal based on household participation in certain other need-tested programs or children's specified vulnerabilities (e.g., foster children). A child shall be considered automatically eligible for a free lunch and breakfast without further application or eligibility determination if the child is:
 - in a household receiving benefits through SNAP or Food Distribution Program on Indian Reservations benefits or TANF cash assistance. Food Distribution Program on Indian Reservations is a program that operates in lieu of or concurrently with SNAP on some Indian reservations;
 - enrolled in Head Start;
 - in foster care;
 - a migrant;
 - a runaway, or
 - homeless.
- c. Community Eligibility Provision: A child can receive free meals if he or she attends a school that has decided to provide free meals to all its students under the Community Eligibility Provision. Community Eligibility Provision is an option in NSLP and SBP law that allows eligible schools and school districts to offer free meals to all enrolled students based on the percentage of their students

who are identified as automatically eligible from non-household application sources, primarily direct certification through other programs. For a school (or school district, or group of schools within a district) to provide free meals to all children, the following must occur:

- the school(s) must be eligible for Community Eligibility Provision, based on the share (40 percent or greater) of its enrolled children that can be identified as categorically (or automatically) eligible for free meals, and
- the school must opt in to Community Eligibility Provision.

Appendix IV: Comments from the Department of Defense



MANPOWER AND
RESERVE AFFAIRS

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

JUN 24 2016

Ms. Brenda S. Farrell
Director, Defense Capabilities and Management
U.S. GAO
441 G St NW
Washington, DC 20548

Dear Ms. Farrell:

I would like to take this opportunity to thank you for allowing us to review the Government Accountability Office (GAO) Report: Military Personnel: DoD Needs More Complete Data on Active-Duty Service members use of Food Assistance Programs. We concur with most of the findings in the report regarding visibility on Service members receiving food assistance programs; however, we non-concur with the GAO report statement stating that DoD "has not coordinated with USDA to access its data on Service member use of the programs it administers."

We have tried for several years to attain Supplemental Nutrition Assistance Program (SNAP) data from the U.S. Department of Agriculture (USDA). Finally, the 2016 National Defense Authorization Act (NDAA) legislated that any safeguards that prevent the use or disclosure of information collected from SNAP recipients would not prevent USDA from disclosing information to DoD. However, the 2016 NDAA does not mandate that USDA provide the data.

The SNAP is administered at the State level where interagency operability limitation between each State system and the USDA makes collecting participant data difficult. Our Defense Manpower Data Center (DMDC) has been in contact with USDA to set up the data exchange agreements and develop a plan to receive that data from USDA. However, DMDC was unable to identify one source within the USDA to obtain the data.

We appreciate GAO's recommendation in the report that would simplify the facilitation of data exchange between the USDA and DoD.

Sincerely,

A handwritten signature in cursive script, reading "Ronald T. Keohane", is positioned above the printed name.

Ronald T. Keohane
Deputy Assistant Secretary of Defense
(Military Community and Family Policy)

**GAO DRAFT REPORT DATED MAY 25, 2015
GAO-16-561 (GAO CODE 100199)**

**“MILITARY PERSONNEL: DoD NEEDS MORE COMPLETE DATA ON ACTIVE-DUTY
SERVICEMEMBERS' USE OF FOOD ASSISTANCE PROGRAM”**

**DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATION**

RECOMMENDATION 1: The GAO recommends that the Secretary of Defense revise, as appropriate, any existing data-collection mechanisms, such as periodic surveys, to collect and analyze more complete data on the use of food assistance programs by servicemembers and their families and use the data to determine if any further actions are needed, such as assigning responsibilities at the department-level for monitoring the use of food assistance programs by active-duty servicemembers.

DoD RESPONSE: Concur.

RECOMMENDATION 2: The GAO recommends that the Secretary of Defense coordinate with USDA to leverage their access to data on active-duty servicemembers and their families that use their programs and services and consider outreach to other organizations that have data on servicemember use of food assistance.

DoD RESPONSE: Partially concur. We have tried for several years to attain Supplemental Nutrition Assistance Program (SNAP) data from the U.S. Department of Agriculture (USDA). Finally, the 2016 National Defense Authorization Act (NDAA) legislated that any safeguards that prevent the use or disclosure of information collected from SNAP recipients would not prevent USDA from disclosing information to DoD. However, the 2016 NDAA does not mandate that USDA provide the data.

The SNAP is administered at the State level where interagency operability limitation between each State system and the USDA makes collecting participant data difficult. Our Defense Manpower Data Center (DMDC) has been in contact with USDA to set up the data exchange agreements and develop a plan to receive that data from USDA. However, DMDC was unable to identify one source within the USDA to obtain the data.

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Brenda S. Farrell, (202) 512-3604 or farrellb@gao.gov

Staff Acknowledgments

In addition to the contact named above, Kay Brown, Rachel Frisk, Dawn Godfrey, Kevin Keith, Amie Lesser, Felicia Lopez, Tamiya Lunsford, Grant Mallie, Kimberly Mayo (Assistant Director), Shahrzad Nikoo, Sara Pelton, Richard Powelson, Monica Savoy, and John Van Schaik made key contributions to this report.

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